

## **REMARKS/ARGUMENTS**

### **1.) Claim Amendments**

Claims 4, 8-14, 16-19, 22, 31-37, 39-41, 51, and 52 are pending in the application. The Applicants have amended claim 22 to correct a typographical error. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **2.) Claim Rejections – 35 U.S.C. § 103(a)**

The Examiner rejected claims 4, 8-10, 12-13, 16-17, 19, 31-33, 35-36, 39-40 and 51-52 under 35 U.S.C. § 103(a) as being unpatentable over Faccin, *et al.* (US 2002/0120844), hereinafter "Faccin '844", in view of Palekar, *et al.* (US 2003/0226017), hereinafter "Palekar". The Applicants have amended the claims to better distinguish the claimed invention from Faccin '844 and Palekar. The Examiner's consideration of the amended claims is respectfully requested.

The Applicants previously distinguished the claimed invention from Faccin by arguing that the nodes in the visited domain in Faccin do not act as mere pass-through nodes. The Examiner has now cited Palekar for showing that feature. In paragraph 0006, Palekar discusses the EAP protocol and states, "These intermediate points can merely act as a pass-through of EAP packets and do not impact the selection of authentication protocol." Paragraph 0006 is in the background section where Palekar discusses the existing EAP protocol, so one skilled in the art would presume the discussion is limited to a single network rather than pass-through nodes in a visited network.

The Examiner also cites paragraph 0054, which states that a foreign access point can act as a pass-through device, simply forwarding along the EAP packets to and from the appropriate foreign authentication server. He then concludes it would be obvious to combine Faccin '844 and Palekar to achieve the claimed invention. However, the remainder of paragraph 0054 states that the foreign authentication server then authenticates the user and sets up an encrypted communication mechanism such

as a TLS tunnel. This differs from the Applicants' claims, such as independent claims 51 and 52, which expressly recite the visited AAA server is also a pass-through node. Thus, the combination of Faccin '844 and Palekar does not disclose or suggest all of the claimed limitations, and a *prima facie* case of obviousness has not been established. Therefore, the allowance of independent claims 51 and 52 is respectfully requested.

Claims 4, 8-10, 12-13, 16-17, 19, 31-33, 35-36, and 39-40 depend from base claim 51 or 52 and recite further limitations in combination with the novel elements of the base claims. Therefore, the allowance of claims 4, 8-10, 12-13, 16-17, 19, 31-33, 35-36, and 39-40 is respectfully requested.

The Examiner rejected claims 11, 18, 34, and 41 under 35 U.S.C. § 103(a) as being unpatentable over Faccin '844 in view of Palekar, as applied to claims 51 and 52 above, and further in view of Akhtar, *et al.* (US 7,079,499), hereinafter "Akhtar". The Applicants respectfully submit that the arguments above for independent claims 51 and 52 above also distinguish the claimed invention from the combination of Faccin '844, Palekar, and Akhtar. The Examiner cites Akhtar for showing a mobility architecture framework where the EAP attributes are EAP TLV attributes. However, Akhtar also fails to disclose or suggest combining a protocol such as EAP with MIPv6, and sending encrypted authentication and authorization information through pass-through nodes in the visited network as claimed by the Applicants. Thus, the combination of Faccin '844, Palekar, and Akhtar does not teach or suggest the invention of base claims 51 and 52. Claims 11, 18, 34, and 41 depend from amended claims 51 or 52 and recite further limitations in combination with the novel and unobvious elements of claims 51 or 52. Therefore, the allowance of claims 11, 18, 34, and 41 is respectfully requested.

The Examiner rejected claims 14 and 37 under 35 U.S.C. § 103(a) as being unpatentable over Faccin '844 in view of Palekar, as applied to claims 51 and 52 above, and further in view of Ohba, *et al.* (US 2004/0098588), hereinafter "Ohba". The Applicants respectfully submit that the arguments above for independent claims 51 and 52 above also distinguish the claimed invention from the combination of Faccin '844, Palekar, and Ohba. The Examiner cites Ohba for showing an authentication method

that uses the PANA and PPP protocols. However, Ohba also fails to disclose or suggest sending encrypted authentication and authorization information through pass-through nodes in the visited network as claimed by the Applicants. Thus, the combination of Faccin '844, Palekar, and Ohba does not teach or suggest the invention of base claims 51 and 52. Claims 14 and 37 depend from amended claims 51 or 52 and recite further limitations in combination with the novel and unobvious elements of claims 51 or 52. Therefore, the allowance of claims 14 and 37 is respectfully requested.

The Examiner rejected claim 22 under 35 U.S.C. § 103(a) as being unpatentable over Faccin '844, [and Palekar] as applied to claims 51 and 52 above, in view of Faccin, *et al.* ("Diameter Mobile IPv6 Application, draft-le-aaa-diameter-mobileipv6-6-03.txt", Internet Draft, XP015004098), hereinafter "Faccin\_Internet-Draft". The Applicants respectfully submit that the arguments above for independent claim 51 above also distinguish the claimed invention from the combination of Faccin '844, Palekar, and Faccin\_Internet-Draft. The Examiner cites Faccin\_Internet-Draft for showing the steps of building, at the mobile device, a home address for the mobile device using at least a portion of the address of its assigned home agent; and transferring the home address of the mobile device from the mobile device to the AAA home network server using a round trip of a selected EAP procedure. However, Faccin\_Internet-Draft also fails to disclose or suggest sending encrypted authentication and authorization information through pass-through nodes in the visited network as claimed by the Applicants. Thus, the combination of Faccin '844, Palekar, and Faccin\_Internet-Draft does not teach or suggest the invention of base claim 51. Claim 22 depends from amended claim 51 and recites further limitations in combination with the novel and unobvious elements of claim 51. Therefore, the allowance of claim 22 is respectfully requested.

### **3.) Conclusion**

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 4, 8-14, 16-19, 22, 31-37, 39-41, 51, and 52.

The Applicants request a telephone interview if the Examiner has any questions or requires any additional information that would expedite the prosecution of the Application.

Respectfully submitted,

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